

KEISHA JONES

A. Yes, I have occasionally. 10:22:47

Q. Is that box still active? 10:22:51

A. No. 10:22:53

Q. When did you close the box? 10:22:55

A. I believe I closed it in the fourth
quarter of 2012. I don't remember the date. 10:22:56
10:22:58

Q. Why did you close that P.O. Box? 10:23:02

A. Because I needed -- I wanted to
transition to a post office that had better hours. 10:23:04
10:23:07

Q. Any other reason? 10:23:11

A. No. 10:23:12

Q. What address was reflected on your
driver's license prior to June, 2010? 10:23:20
10:23:22

A. It was an old address. 915 East
178th Street. 10:23:25
10:23:34

MR. KARAMOUZIS: Can you repeat that? 10:23:34

THE WITNESS: 915 East 178th Street. 10:23:36

Q. Were you living there prior to
June, 2010? 10:23:39
10:23:42

A. No. 10:23:43

Q. Why did that address appear on your
license? 10:23:43
10:23:46

A. I didn't change it. It was -- I
grew up in a family house, so I didn't change the 10:23:47
10:23:49

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address.

10:23:51

Q. When did you live at 915 East 178th Street?

10:23:51

A. I lived there through high school, college, all the way up until 2000 -- no, not 2000. Up until 1997.

10:23:55

10:23:55

10:23:59

10:24:04

Q. You moved out in 1997?

10:24:09

A. Correct.

10:24:13

Q. Have you lived there at 915 East 178th Street at any point since 1997?

10:24:13

10:24:17

A. No.

10:24:19

Q. Up until June, 2010 your license always reflected that your physical address was 915 East 178th Street?

10:24:25

10:24:30

10:24:34

A. Right, correct.

10:24:36

Q. Did you use that address for other purposes?

10:24:37

10:24:45

A. What address?

10:24:46

Q. 915 East 178th Street.

10:24:47

A. I don't understand the question.

10:24:52

Q. Did you use the address 915 East 178th Street for any purposes at all?

10:24:54

10:25:05

A. After I moved?

10:25:09

Q. After 1997.

10:25:11

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A. No.

10:25:12

Q. Did you receive any mail at 915

10:25:18

East 178th Street?

10:25:23

A. If it was from the Department of

10:25:23

Motor Vehicles, yes.

10:25:25

Q. Why is that? Because that is the

10:25:26

license that was on my address. That is the address

10:25:28

that they had on file?

10:25:31

A. Correct, if something came from DMV

10:25:32

it could have gone to that address.

10:25:34

Q. Did you use that address for any

10:25:36

other purposes?

10:25:38

A. When?

10:25:38

Q. After 1997?

10:25:39

A. No.

10:25:39

Q. Do you have a copy of your birth

10:25:45

certificate?

10:25:47

A. I don't know where it is, I believe

10:25:47

it is somewhere. I'm still looking for it.

10:25:49

Q. Where have you searched?

10:25:51

A. I searched all of my files and bags

10:25:53

and books.

10:25:56

Q. When is the last time that you seen

10:25:58

it?

10:26:00

1 KEISHA JONES

2 A. I don't recall.

10:26:00

3 Q. Have you seen it in the last five
4 years?

10:26:04

10:26:07

5 A. Yes.

10:26:07

6 Q. Have you seen it in the last year?

10:26:08

7 A. No, I haven't seen it in the last
8 year.

10:26:09

10:26:12

9 Q. Is there a place where you keep
10 your files stored?

10:26:12

10:26:14

11 A. They are in various places because
12 I have been displaced. So I have bags and boxes
13 and just strewn about.

10:26:17

10:26:20

10:26:24

14 Q. What do you mean when you say
15 strewn about?

10:26:29

10:26:32

16 A. Some are with me and some are at
17 someone's house, some are in someone's basement
18 because I have been displaced since -- for the
19 last couple of years, so things have not -- just
20 are not organized for that reason. Not as
21 organized.

10:26:32

10:26:35

10:26:39

10:26:42

10:26:45

10:26:48

22 Q. Have you searched all documents
23 that you had in your possession?

10:26:48

10:26:51

24 A. I have.

10:26:54

25 Q. Have you searched all the documents

10:26:56

1 KEISHA JONES

2 that you had in other people's basements that were 10:26:58
3 yours? 10:27:01

4 A. I have. 10:27:01

5 Q. Is there anywhere else other than 10:27:02
6 in your house or someone else's basement where you 10:27:10
7 have records stored? 10:27:14

8 A. I have looked -- I looked everywhere 10:27:15
9 where I have my personal belongings and I cannot 10:27:18
10 locate it, but I just have to keep looking because 10:27:22
11 that is not a document that I carry in my bag. 10:27:25
12 So, it could be stuck between pieces of paper and 10:27:28
13 I overlooked it . It could be inside of a book 10:27:30
14 and I overlooked it. 10:27:33

15 Q. Do you think it is lost? 10:27:33

16 A. No, I do not. 10:27:37

17 Q. Do you have a social security card? 10:27:38

18 A. I do. 10:27:48

19 Q. Where is that? 10:27:50

20 A. I don't know where it is at the 10:27:52
21 moment. 10:27:55

22 Q. Have you searched for it? 10:27:56

23 A. Yes. 10:27:58

24 Q. Where have you searched? 10:28:00

25 A. All of my documents and bags and 10:28:02

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clothes and I can't seem to locate it at the moment.

10:28:05

10:28:09

Q. When is the last time that you saw it?

10:28:09

10:28:10

A. I honestly don't know. That is not a document that I carry.

10:28:10

10:28:13

Q. Have you seen it in the last five years?

10:28:15

10:28:18

A. I have seen it in the last five years.

10:28:18

10:28:23

Q. Is that a document you keep track of?

10:28:23

10:28:25

A. When you say keep track of, what do you mean?

10:28:27

10:28:29

Q. Is that a document that you retain in a safe place?

10:28:30

10:28:34

A. It's a document that I do retain. A safe place would be my own house. Since I'm not in my own house it is not in a safe place. That is why I can't find it. If I were in my own house I would have it handy.

10:28:35

10:28:39

10:28:43

10:28:45

10:28:48

Q. Do you think it is important to keep the social security card in a safe place?

10:28:51

10:28:52

A. It is important.

10:28:55

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1 Q. Why haven't you -- as a victim of 10:28:56
2 alleged identity theft, did you need to locate the 10:29:05
3 social security card? 10:29:13
4

5 MR. MALLON: Objection, form. 10:29:14

6 A. I'm sorry? 10:29:15

7 Q. Has anyone asked for a copy of your 10:29:16
8 social security card prior to this litigation? 10:29:18

9 A. No. 10:29:20

10 Q. Did you look for the card in the 10:29:21
11 context of your alleged identity theft? 10:29:22

12 MR. MALLON: Objection, asked and 10:29:27
13 answered. 10:29:28

14 A. Can you repeat that again? 10:29:29

15 Q. Did you look for the social 10:29:31
16 security card in the context of your alleged 10:29:36
17 identity theft? 10:29:39

18 MR. MALLON: Same objection. 10:29:39

19 A. What do you mean in the context of 10:29:40
20 my alleged identity theft? 10:29:42

21 Q. You claim that your identity was 10:29:45
22 stolen in the past. 10:29:52

23 A. My identity was stolen, correct. 10:29:52

24 Q. And you investigated that theft; is 10:29:55
25 that right? 10:29:55

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A. That's correct.

10:30:02

Q. During that investigation did you
locate your social security card?

10:30:02

10:30:08

A. I didn't have a need for the
physical card. So it wasn't something that I had
to look for or give to anyone.

10:30:09

10:30:12

10:30:14

Q. Did you verify where it was located
during your investigation?

10:30:18

10:30:24

A. When I was at home, yes, I knew
where it was. Since I'm not at home, it is just -- I don't
know where it is. I know it is not lost in the
street, that I know.

10:30:25

10:30:31

10:30:36

10:30:38

Q. You lost track of it?

10:30:40

A. It's amongst my possessions
somewhere. I have to keep looking for it.

10:30:41

10:30:44

Q. Do you have a passport?

10:30:51

A. I do.

10:30:52

Q. Where is that located?

10:30:52

A. I cannot locate that at the moment
either.

10:30:54

10:30:56

Q. When is the last time that you saw
that?

10:30:56

10:30:57

A. Probably early 2000s, the last time
that I travelled overseas.

10:30:58

10:31:03

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Q.	And you have since lost track of	10:31:07
it?		10:31:09
A.	I'm not sure where it is, correct.	10:31:09
Q.	Have you looked for it?	10:31:12
A.	Yes, I have.	10:31:15
Q.	When?	10:31:16
A.	I have been looking for it for the	10:31:17
last couple of months.		10:31:20
Q.	Have you searched all of your	10:31:24
belongings?		10:31:26
A.	Correct.	10:31:27
Q.	Do you have any idea where it could	10:31:27
be?		10:31:29
A.	Amongst my belongings somewhere	10:31:29
and I anticipate that when I do finally get settled again I		10:31:33
will find all of my documents. None of my documents are		10:31:37
lost in the street.		10:31:42
Q.	So it is somewhere in your possession?	10:31:43
A.	Somewhere.	10:31:45
Q.	Did you ever report a missing	10:31:53
social security card?		10:31:55
A.	No.	10:31:57
Q.	Did you ever report a missing	10:31:58
passport?		10:32:00

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1
2 A. Because as I was making my
3 transition and preparing to rent my apartment, I
4 had a problem with the flooring company, then I
5 discovered the identity theft, and it wasn't just
6 my identity theft, it was in the news and well
7 documented in 2005 that there was a massive bank
8 data theft of employees stealing people's
9 information. So it was quite a bit to do here at
10 home.

11:27:20

11:27:22

11:27:26

11:27:29

11:27:33

11:27:36

11:27:40

11:27:43

11:27:48

11 So I couldn't just get up and go
12 knowing that I had this fraud issue to deal with.
13 And it was prior to New York enacting the Security
14 Freeze Law.

11:27:49

11:27:52

11:27:54

11:28:00

15 Q. Why couldn't you handle the issue
16 from North Carolina?

11:28:00

11:28:04

17 A. It didn't make sense to do that.

11:28:06

18 Q. Why?

11:28:07

19 A. I needed to be here because I
20 didn't know what was happening. I never had any
21 problems with my credit. I never had any fraud or
22 dealing with the police. I never had any issue.
23 I didn't know what was happening or what was going
24 on. I never had money stolen out of a bank
25 account. None of those things happened to me.

11:28:08

11:28:09

11:28:13

11:28:15

11:28:18

11:28:20

11:28:23

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1 Q. Did you make copies of that
2 original report?
3

14:44:53

4 A. Yes.

14:44:54

5 Q. How many copies?
6

14:44:55

7 A. I don't recall how many copies, but
8 at least three.

14:44:55

14:44:56

9 Q. Did you send the report anywhere?
10

14:44:58

11 A. I did. I believe I did.

14:44:58

12 Q. Where did you send the report?
13

14:45:01

14 A. In 2006 when I got my credit
15 reports I believe I sent that along with a letter
16 and whatever else I need to send after New York
17 State enacted the Security Freeze Law in November
18 of 2006.

14:45:06

14:45:08

14:45:12

14:45:17

14:45:21

19 Q. Where did you send the report?
20

14:45:23

21 A. To Equifax, Experian and Trans
22 Union.

14:45:24

14:45:28

23 Q. Do you have any report of ever
24 having sent a police report to Experian?
25

14:45:32

14:45:32

14:45:34

14:45:37

14:45:39

14:45:41

14:45:44

14:45:51

26 A. I didn't keep a copy. I can't find
27 the copies of the actual letter and attachments
28 that went with it.

29 Q. Do you have any evidence indicating
30 that you sent the police report to Experian?